AR201-14104

Richard Hefter
12/04/2002 03:53 PM

To: NCIC HPV@EPA
cc:
Subject: Dow Response to EPA comments on Ethyl Monochloroacetate HPV Chall enge submission

2 of 4
----- Forwarded by Richard Hefter/DC/USEPA/US on 12/04/02 03:51 PM -----

"Deford, Connie (CL)" <CLDeford@dow.com >
11/15/02 04:55 PM

To: Richard Hefter/DC/USEPA/US@EPA
cc: Ralph Northrop/DC/USEPA/US@EPA
Subject: Dow Response to EPA comments on Ethyl Monochloroacetate HPV Chall enge submission

Please find attached The Dow Chemical Company's response to EPA comments on our Ethyl Monochloroacetate HPV Challenge submission. Please let me know if you need to receive our letter in a pdf file or if the letter needs to be sent to a different site.

Thank you.

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EPA HPV EMCA Response.doc

The Dow Chemical Company
Midland, Michigan 48674

2020 Dow Center
November 15, 2002

Richard Hefter
U.S. Environmental Protection Agency

Dear Mr. Hefter:

Thank you for your review of our Chemical RTK HPV Challenge Submission on Ethyl Monochloroacetate (EMCA). This letter is the initial response of The Dow Chemical Company (Dow) to the conclusions that EPA reached on the EMCA Submission. As noted below, we will be providing additional information to respond further to the conclusions noted by the EPA.

Physicochemical and Environmental Fate Data:
(a) The submission will be updated to identify whether each of he physicochemical data points is measured or calculated.
(b) Dow will review the transport and distribution robust summary to determine if corrections need to be made. If errors are found, the robust summary will be updated.

2. Health Endpoints:
(a) Dow believes that sufficient mutagenicity information is available to assess the genotoxicity potential of EMCA. Further, Dow will be providing an enhanced IUCLID document on Chloroacetic acid (CAA), which contains additional mutagenicity information.
(b) Dow appreciates the Agency's interest in seeking adequate information to confirm that EMCA is used as a closed-system intermediate. However, Dow is unsure that it can provide further detail without claiming it as *Confidential Business Information (CBI).* Dow would like to schedule a teleconference with the Agency to discuss this issue further.
(c) In response to the developmental data gap that the Agency has identified, as noted, Dow will be providing an enhanced IUCLID document on CAA, which contains summaries of both a reproductive and a developmental toxicity study.

3. Ecological Endpoints:
(a) As noted, Dow will be providing an enhanced IUCLID document on CAA, which the Agency can use to fulfill the aquatic invertebrate data gap.
(b) Dow will review the robust summary of the fish toxicity study to determine if additional information is available. If there isn't additional information, we will

request that the Agency consider the fish toxicity data available on CAA to meet the gap identified.

(c) The testing on algae has been completed.

The updated EMCA IUCLID document, an enhanced CAA IUCLID document, and other relevant information will be provided to the EPA by January 15, 2003. Please let us know whom we should contact to arrange a teleconference to discuss further the data that EPA would like to receive to satisfy the requirements of a closed looped intermediate.

Regards,

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